

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

MICHAEL ANDERSON,
Defendant.

CASE NO. 1:22-cr-68

JUDGE McFarland

INDICTMENT

18 U.S.C. § 2

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. §§ 853(a) and (p)

28 U.S.C. § 2461(c)

NOTICE OF FORFEITURE

THE GRAND JURY CHARGES:

COUNT 1

(POSSESSION OF A CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE)

On or about November 7, 2021, in the Southern District of Ohio, defendant **MICHAEL ANDERSON** knowingly and intentionally possessed with the intent to distribute a mixture or substance containing 40 grams or more of fentanyl, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B) and 18 U.S.C. § 2.

COUNT 2

(POSSESSION OF A CONTROLLED SUBSTANCE ANALOGUE WITH INTENT TO DISTRIBUTE)

On or about November 7, 2021, in the Southern District of Ohio, defendant **MICHAEL ANDERSON** unlawfully, knowingly, and intentionally possessed with the intent to distribute one hundred (100) grams or more of a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance analogue as defined in 21 U.S.C. § 802(32), knowing that the substance was intended for human consumption as provided in 21 U.S.C. § 813, all in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(A).

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses set forth in Counts 1 or 2 of this Indictment, defendant **MICHAEL ANDERSON** shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the such violation(s), and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s).

SUBSTITUTE ASSETS

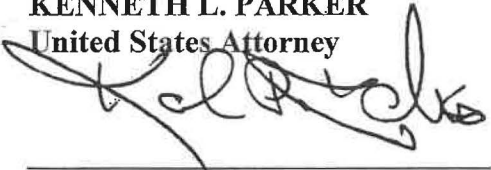
If any of the above-described forfeitable property, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) or as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant, up to the value of the above forfeitable property.

A TRUE BILL

15/

GRAND JURY FOREPERSON

KENNETH L. PARKER
United States Attorney



KARL P. KADON
Assistant United States Attorney
Chief, Criminal Division
Southern District of Ohio